

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN, )  
DEONTAE TATE, JEREMY S. MELTON, )  
ISSACCA POWELL, KEITH BURGESS, )  
TRAVIS BOYD, TERRENCE DRAIN, and )  
KIMBERLY ALLEN on behalf of themselves and )  
all similarly situated persons, )

Plaintiffs, )

v. )

BILL OLDHAM, in his individual capacity as )  
former Sheriff of Shelby County, Tennessee; )  
FLOYD BONNER, JR., in his official capacity as )  
Sheriff of Shelby County, Tennessee; ROBERT )  
MOORE, in his individual capacity as former Jail )  
Director of Shelby County, Tennessee; KIRK )  
FIELDS, in his official capacity as Jail Director of )  
Shelby County, Tennessee; CHARLENE )  
MCGHEE, in her individual capacity as former )  
Assistant Chief of Jail Security of Shelby County, )  
Tennessee; REGINALD HUBABARD, in his )  
official capacity as Assistant Chief of Jail Security )  
of Shelby County, Tennessee; DEBRA )  
HAMMONS, in her individual capacity as former )  
Assistant Chief of Jail Programs of Shelby County, )  
Tennessee; TIFFANY WARD in her official )  
capacity as Assistant Chief of Jail Programs of )  
Shelby County, Tennessee; SHELBY COUNTY, )  
TENNESSEE, a Tennessee municipality; TYLER )  
TECHNOLOGIES, INC., a foreign corporation; )  
GLOBAL TEL\*LINK CORPORATION, a foreign )  
corporation; SOFTWARE AG CLOUD )  
AMERICAS, INC., a foreign corporation; and )  
SIERRA-CEDAR, INC., a foreign corporation, )

Defendants. )

No. 2:16-cv-02907-SHM-tmp

**DEFENDANT GLOBAL TEL\*LINK CORPORATION'S UNOPPOSED**  
**MOTION FOR EXTENSION OF TIME TO PLEAD OR OTHERWISE**  
**RESPOND TO THE FOURTH AMENDED COMPLAINT**

Pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, Defendant Global Tel\*Link Corporation (“GTL”) moves for a 21-day extension of time within which to plead or otherwise respond to the Fourth Amended Complaint. As grounds for this motion, GTL states the following:

1. On November 17, 2016, Plaintiffs filed their “Class Action Complaint for Civil Rights Violations” against Bill Oldham, individually and in his official capacity as the Sheriff of Shelby County. Doc. 1.

2. Plaintiffs amended their complaint on March 24, 2017 (Doc. 43), May 4, 2017 (Doc. 52), July 30, 2018 (Doc. 103), and again on January 18, 2019 (Doc. 138). Plaintiffs’ most recent amendment, the Fourth Amended Complaint, named GTL as a defendant.

3. Pursuant to Rule 12, GTL’s deadline to plead or otherwise respond to the Fourth Amended Complaint is February 15, 2019.

4. On February 1, 2019, counsel for GTL requested that counsel for Plaintiffs extend the deadline by which GTL could plead or otherwise respond to the Fourth Amended Complaint. Counsel for Plaintiffs stated that they were unopposed to a 21-day extension of time to plead or otherwise respond to the Fourth Amended Complaint.

5. GTL submits that good cause exists for the requested extension so that GTL can analyze the Court’s docket, which spans 151 docket entries, and the 50-page, 177 paragraph Fourth Amended Complaint to determine the appropriate procedural vehicle to respond.

6. GTL further submits that this motion is not made for the purposes of delay and that Plaintiffs will not be prejudiced by the requested extension.

WHEREFORE, GTL respectfully requests that its Unopposed Motion for Extension of Time to Plead or Otherwise Respond to the Fourth Amended Complaint be granted and that GTL be allowed an extension of time through and including March 8, 2019, within which to respond

to the Fourth Amended Complaint. GTL requests such further and additional relief as may be just and appropriate.

Respectfully submitted,

s/ R. Brandon Bundren

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*Attorney for Global Tel\*Link Corporation*

#### **CERTIFICATE OF CONSULTATION**

I certify that I, counsel for GTL, conferred with counsel for Plaintiffs, Frank L. Watson, III, by email on February 1, 2019 regarding the relief requested in this motion. Counsel for Plaintiffs confirmed that Plaintiffs are unopposed to a 21-day extension of time for GTL to plead or otherwise respond to the Fourth Amended Complaint.

s/ R. Brandon Bundren

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R. Brandon Bundren

#### **CERTIFICATE OF SERVICE**

I certify that on the 4th day of February, 2019, I electronically filed a true and correct copy of this **Unopposed Motion for Extension of Time to Plead or Otherwise Respond to the Fourth Amended Complaint** with the U.S. District Court for the Western District of Tennessee using the Court's Electronic Case Filing System, which will send notice of this filing to counsel of record as follows:

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s/ R. Brandon Bundren  
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